

# Maine Yankee

RELIABLE ELECTRICITY SINCE 1972

329 BATH ROAD • BRUNSWICK, MAINE 04011 • (207) 798-4100

November 18, 1996

MN-96-170

JRH-96-258

## UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, D. C. 20555

Reference: (a) License No. DPR-36 ( Docket No. 50-309 )

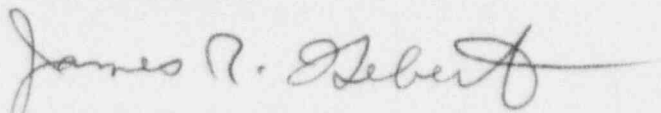
Subject: Maine Yankee Licensee Event Report 96-035, Requirement for Post Accident Iodine Sampling Inadvertently Removed From Procedure

Gentlemen:

Please find enclosed Maine Yankee Licensee Event Report 96-035 . This report is submitted in accordance with 10 CFR 50.73(a)(2)(i).

Please contact us should you have any questions regarding this matter.

Very truly yours,



James R. Hebert, Manager  
Licensing & Engineering Support Department

mwf

Enclosure

c: Mr. Hubert Miller  
Mr. J. T. Yerokun  
Mr. D. H. Dorman  
Mr. Patrick J. Dostie  
Mr. Uldis Vanags

25003:

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## LICENSEE EVENT REPORT (LER)

(See reverse for required number of

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Maine Yankee Atomic Power Company

DOCKET NUMBER (2)

50-309

PAGE (3)

1 OF 3

TITLE (4)

Requirement for Post Accident Iodine Sampling Inadvertently Removed From Procedure

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	18	96	96	035	00	11	18	96	FACILITY NAME	DOCKET NUMBER
OPERATING MODE (9)		7	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
POWER LEVEL (10)		90	20.2201(b)		20.2203(a)(2)(v)		X		50.73(a)(2)(i)	50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)				50.73(a)(2)(ii)	50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)				50.73(a)(2)(iii)	73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)				50.73(a)(2)(iv)	OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)				50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)				50.73(a)(2)(vii)	

## LICENSEE CONTACT FOR THIS LER (12)

NAME

Ethan Brand, NSEG Supervisor

TELEPHONE NUMBER (Include Area Code)

(207) 882-5661

## COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPDs

## SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO
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EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

## ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On October 18, 1996, Maine Yankee was operating at 90% power.

Amendment #52 to Maine Yankee's Facility Operating License (dated 2/6/81) added 2 new License Conditions to satisfy Category "A" TMI-2 Lessons Learned Recommendations. One of these new License Conditions, paragraph 2.B.(6), sub-paragraph (f) Iodine Sampling states " the licensee shall implement a program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions."

Maine Yankee committed to satisfying this condition, in part, by incorporating the requirements into Maine Yankee's Radiation Protection Program, specifically Proc No. 9-304-1, SAMPLING FOR AIRBORNE RADIOACTIVE MATERIALS.

At 1500 on 10/18/96 a Licensing Engineer and the Radiation Protection Manager notified Operations that the wording intended to fulfill Maine Yankee's commitment to this License Condition had been deleted from RP Proc. No. 9-304-1 when it was revised and re-issued on 8/14/96.

At 1600 on 10/18/96, Rad Protection issued a TPC for Class D Proc No. 9-304-1 to replace the missing wording. The longer term corrective actions are to continue with an ongoing effort to identify and properly reference the NRC radiation protection commitments.

## LICENSEE EVENT REPORT (LER)

## TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)	PAGE (3)
Maine Yankee Atomic Power Company	50-309	YEAR	2 OF 3
		SEQUENTIAL NUMBER 96 -- 035 -- 00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

## INITIAL PLANT CONDITIONS:

On October 18, 1996, Maine Yankee was operating steady state at 90% power.

## EVENT DESCRIPTION:

**Background:** Amendment #52 to Maine Yankee's Facility Operating License (dated 2/6/81) added 2 new License Conditions to satisfy Category "A" TMI-2 Lessons Learned Recommendations. One of these new License Conditions, paragraph 2.B.(6), sub-paragraph (f) Iodine Sampling states " the licensee shall implement a program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions."

Maine Yankee committed to satisfying this condition by incorporating the requirements into Maine Yankee's Radiation Protection Program (Reference MY RP Proc. No. 9-4-100, Rev 4, para. 2) and it's associated procedures for monitoring airborne radioiodine under normal and emergency situations; specifically Proc No. 9-304-1, SAMPLING FOR AIRBORNE RADIOACTIVE MATERIALS.

One lesson learned from TMI was that charcoal sampling cartridges become saturated and ineffective when used in atmospheres with high noble gas concentrations. Therefore, in order to ensure the capability to accurately determine iodine concentration under accident conditions, Maine Yankee Proc No. 9-304-1 purposely contained the following wording: "IF it is known or suspected that noble gas concentrations in the area to be sampled are 1E-1 uCi/ml or greater and IF available, THEN use silica gel or silver zeolite cartridges in lieu of charcoal cartridges."

**Event:** At 1500 on 10/18/96 a Licensing Engineer and the Radiation Protection Manager notified the PSS that the wording intended to fulfill Maine Yankee's commitment to a License Condition had been deleted from RP Proc. No. 9-304-1 when it was revised and re-issued on 8/14/96; and requested a report ability determination on this issue.

At 1600 on 10/18/96, Rad Protection issued a TPC for Class D Proc No. 9-304-1 to replace the missing wording.

## LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Maine Yankee Atomic Power Company	50-309	96	-- 035	-- 00	3 OF 3

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

## SAFETY SIGNIFICANCE:

The safety significance of this event is negligible. The training of personnel who conduct the iodine sampling is consistent with the license condition. The maintenance and availability of the equipment needed for the sampling was not impacted by the removal of the wording from 9-304-1.

## CAUSAL FACTORS:

The primary cause of this event was less than adequate control of a licensing commitment.

The removal of the specific wording from procedure 9-304-1 was done to simplify the procedure. It was felt by the personnel changing the procedure that the steps involved were "skill of the trade". The specific requirement of the commitment was not referenced by the procedure therefore the person changing the procedure was not aware of the licensing commitment.

## CORRECTIVE ACTIONS:

Procedure 9-304-1 was corrected to include the required wording.

Procedure 9-304-1 wording was annotated to indicate the linkage to an NRC commitment.

The longer term corrective action is to continue with an ongoing effort to identify and properly reference the NRC radiation protection commitments.

## SIMILAR EVENTS:

LER 96-010 "Failure to Perform System Integrity Inspections" is similar in that a licensing commitment was inadvertently not complied with. No previous events involving post accident iodine sampling have been reported via LER.